## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

RADHA GEISMANN, M.D., P.C., individually and on behalf of all others similarly-situated,	) ) )
Plaintiff,	) Cause No: 4:19-cv-00676 HEA
V.	)
POS-T-VAC, LLC, and JOHN DOES 2-10,	)
Defendants.	)

# PLAINTIFF'S DISMISSAL OF INDIVIDUAL CLAIMS WITH PREJUDICE OF ITS CLAIMS AGAINST DEFENDANT POS-T-VAC, LLC

Pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii), Plaintiff, RADHA GEISMANN M.D., P.C., with consent of Defendant, POS-T-VAC, LLC, hereby dismisses its individual claims against Pos-T-Vac, LLC with prejudice. No notice needs to be issued to the putative class under Rule 23, because there has been no finding that this action can proceed as a class action, and no class has been certified herein. Each party shall bear their own costs.

Respectfully submitted,

MARGULIS LAW GROUP

By: /s/ Max G. Margulis
Max G. Margulis
28 Old Belle Monte Road
Chesterfield, Missouri 63017
maxmargulis@margulislaw.com

Brian J. Wanca ANDERSON + WANCA 3701 Algonquin Rd., Ste. 500 Rolling Meadows. IL 60008 bwanca@andersonwanca.com

ATTORNEYS FOR PLAINTIFF, RADHA GEISMANN, M.D., P.C.

#### And:

### ARMSTRONG TEASDALE LLP

By: /s/ Jonathan R. Shulan (with permission)
Eric M. Walter #47297MO
Jonathan R. Shulan #65426MO
7700 Forsyth Blvd., Suite 1800
St. Louis, Missouri 63105
314.621.5070
314.621.5065 (facsimile)
ewalter@armstrongteasdale.com
jshulan@armstrongteasdale.com

and

MORGAN, LEWIS & BOCKIUS LLP Ezra D. Church (*pro hac vice*) 1701 Market Street Philadelphia, Pennsylvania 19103 215.963.5000 ezra.church@morganlewis.com

ATTORNEYS FOR DEFENDANT POS-T-VAC, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2020, I electronically filed the foregoing Joint Stipulation of Dismissal with the Clerk of the Court using the CM/ECF system which will send notification of such filings to all counsel of record.

/s/ Max G. Margulis Max G. Margulis